

**Mao Declaration**  
**EXHIBIT A**  
**Redacted Version of**  
**Document Sought to be Sealed**

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14

15 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

16 CHASOM BROWN, et al., individually and  
17 on behalf of all similarly situated,

Case No. 4:20-cv-03664-YGR-SVK

18 Plaintiffs,

**SUPPLEMENTAL DECLARATION OF**  
**MARTIN SRAMEK IN RESPONSE TO**  
**May 20, 2022 ORDER**

19 vs.

Referral: Hon. Susan van Keulen, USMJ

20 GOOGLE LLC,

21 Defendant.

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1 I, Martin Sramek, declare as follows:

2 1. I am the Privacy Working Group lead for Chrome. I have been employed at Google  
3 since October 2014, and I have worked on issues related to Chrome privacy for the duration of my  
4 tenure. I make this declaration based on personal knowledge and information provided to me by  
5 Google colleagues and, if called to testify, I could and would competently testify to such facts.

6 2. I understand that the Court has ordered that "Google must provide Plaintiffs with a  
7 representation in writing no later than May 31, 2022 that other than the logs identified thus far as  
8 containing Incognito-detection bits, no other such logs exist."

9 3. Pursuant to the Court's order, I submitted a declaration on May 31, 2022. That  
10 declaration noted that "[t]he investigation is ongoing and should be completed within the next two  
11 weeks, by June 14, 2022," and I "reserve[d] the right to supplement my attestation with any  
12 additional finding resulting from this continued investigation."

13 4. The additional two-week investigation referenced in my May 31, 2022 declaration is  
14 now concluded. For that investigation, I worked with Google employee Matt Harren, the [REDACTED]  
15 Logs Technical Lead, to identify additional logs containing Incognito-detection bits. In addition, I  
16 supervised a robust code audit to identify any additional uses of the X-Client-Data header for  
17 Incognito detection. Our investigation led to the identification of the additional logs identified in the  
18 charts attached hereto as Exhibit A.

19 5. My further investigation confirmed that when the maybe\_chrome\_incognito bit was  
20 added to the [REDACTED] or [REDACTED] logs previously identified  
21 by Google, it was copied to each of the logs identified in Exhibit A. This replication to additional  
22 logs is an artifact of Google's backend infrastructure, which is constructed to direct data traffic  
23 collected for a targeted purpose to a targeted log.

24 6. The logs identified in Table 1 of Exhibit A are [REDACTED] logs that begin with  
25 the prefix [REDACTED] meaning they are used for experiments that extract data from the [REDACTED]  
26 [REDACTED] or [REDACTED] logs and perform analysis and modeling to  
27 predict ad revenues. These do not record unique records of user browsing beyond what is recorded  
28 in the [REDACTED] or [REDACTED] logs.

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1       7.     The logs identified in Table 2 of Exhibit A are [REDACTED] logs. These are currently used  
2 for analysis and testing. They do not record additional data regarding user browsing beyond what is  
3 recorded in the [REDACTED] or [REDACTED] logs.

4       8.     The logs identified in Table 3 of Exhibit A are [REDACTED] logs. [REDACTED]  
5 [REDACTED]  
6 [REDACTED] They do not record additional data regarding user browsing beyond what is  
7 recorded in the [REDACTED] logs. Google previously disclosed [REDACTED] logs.

8       9.     The logs identified in Table 4 of Exhibit A are [REDACTED] logs.  
9 [REDACTED]  
10 [REDACTED] The [REDACTED] log [REDACTED] contains information  
11 regarding user browsing that was included in two other logs previously disclosed by Google,  
12 [REDACTED] and [REDACTED] The log [REDACTED]  
13 [REDACTED] contains joined information from [REDACTED]  
14 [REDACTED]  
15 [REDACTED],  
16 all of which were previously disclosed by Google. The other [REDACTED] logs in Table 4 of Exhibit A  
17 contain [REDACTED], which were not previously disclosed by Google, joined with  
18 [REDACTED].

19       10.    The logs identified in Table 5 of Exhibit A are [REDACTED] logs. [REDACTED]  
20 [REDACTED]

21       11.    The logs identified in Table 6 of Exhibit A are [REDACTED]  
22 [REDACTED]

23       12.    The investigation also identified the log [REDACTED], which  
24 contains the field "is\_chrome\_non\_incognito\_mode." That log does not contain any GAIA, Biscotti,  
25 or Zwieback identifiers.

26       13.    In Google's previous disclosures and in my previous declaration, a typographical  
27 error led to the inadvertent disclosure of the test version of log [REDACTED]  
28 [REDACTED] The correct name for the equivalent log that contains data for

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1 users of Google services is [REDACTED]. Google searched [REDACTED]  
2 [REDACTED] pursuant to the Special Master process. Another typographical  
3 error appeared in the log named [REDACTED] - the correct name is [REDACTED]  
4 [REDACTED]

5 I declare under penalty of perjury of the laws of the United States of America that the  
6 foregoing is true and correct.

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8 Executed on the 14th day of June 2022 at Munich, Germany.

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10 DATED: June 14, 2022

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/s/ Martin Sramek

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Martin Sramek

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## **Exhibit A**

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**Table 1 -** **Logs**

Log	Incognito Bit
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

**Table 2 -** [REDACTED] Logs

Log	Incognito Bit
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

**Table 3 -** **Logs**

Log	Incognito Bit
14	
15	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
16	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
17	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
18	
19	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
20	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
21	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
22	
23	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
24	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
25	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
26	
27	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

**HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**1 **Table 4 - [REDACTED] Logs**

2 Log	3 Incognito Bit
4 [REDACTED]	5 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 6 nd_ads_identity_team
7 [REDACTED]	8 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 9 nd_ads_identity_team
10 [REDACTED]	11 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 12 nd_ads_identity_team
13 [REDACTED]	14 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 15 nd_ads_identity_team
16 [REDACTED]	17 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 18 nd_ads_identity_team
19 [REDACTED]	20 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 21 nd_ads_identity_team
22 [REDACTED]	23 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 24 nd_ads_identity_team
25 [REDACTED]	26 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 27 nd_ads_identity_team
28	

10 **Table 5 - [REDACTED] Logs**

11 Log	12 Incognito Bit
13 [REDACTED]	14 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 15 nd_ads_identity_team
16 [REDACTED]	17 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 18 nd_ads_identity_team
19 [REDACTED]	20 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 21 nd_ads_identity_team
22 [REDACTED]	23 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 24 nd_ads_identity_team
25 [REDACTED]	26 maybe_chrome_incognito_do_not_use_without_consulting_legal_a 27 nd_ads_identity_team
28	

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1	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
2	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
3	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
4	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
5	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
6	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
7	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
8	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
9	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
10	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
11	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
12	[REDACTED]	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team

**Table 6 - Logs**

Log	Incognito Bit
15	
16	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
17	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
18	maybe_chrome_incognito_do_not_use_without_consulting_legal_and_ads_identity_team
19	